



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 21, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)

Dear Judge Nathan:

Pursuant to the Court's Order at Dkt. No. 477, the Government is submitting today proposed redactions to the parties' supplemental briefing regarding Witness-3 and the Court's Memorandum Opinion & Order resolving those motions.

The Government's proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although the parties' supplemental briefing and the Court's Opinion & Order are judicial documents subject to the common law presumption of access, the limited proposed redactions are narrowly tailored to protect the privacy interests of Witness-3, who has not identified herself on the record in this case, and who is a subject of the Court's pseudonym order. In addition, some of the proposed redactions reference sealed materials from the Rule 412 litigation, which are "related materials" within the meaning of Fed. R. Evid. 412(c)(2).

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